

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2019 MAR 21 PM 4:12

UNITED STATES OF AMERICA

v.

Criminal No.

SIR MICHAEL JAMES, a.k.a. "Corey,"

STEPHANY GUERRERO-RODRIGUEZ
Defendants

5:19-cr-48-1-2-3

CLERK
BY DEPUTY CLERK

INDICTMENT

The Grand Jury charges:

COUNT ONE

In or about February 2019, in the District of Vermont, the defendants, SIR MICHAEL JAMES, a.k.a. "Corey," [REDACTED] STEPHANY GUERRERO-RODRIGUEZ, knowingly and willfully conspired together and with others, known and unknown to the grand jury, to distribute heroin, a schedule I controlled substance, cocaine base, a schedule II controlled substance, and cocaine, a schedule II controlled substance.

With respect to SIR MICHAEL JAMES, a.k.a. "Corey," and STEPHANY GUERRERO-RODRIGUEZ, their conduct as members of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), 846)

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COUNT TWO

On or about February 22, 2019, in the District of Vermont, the defendant, SIR MICHAEL JAMES, a.k.a. "Corey," knowingly and intentionally possessed with the intent to distribute heroin, a schedule I controlled substance, 28 grams or more of cocaine base, a schedule II controlled substance, and cocaine, a schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B); 18 U.S.C. § 2)

COUNT THREE

On or about February 22, 2019, in the District of Vermont, the defendant [REDACTED]

[REDACTED] knowingly and intentionally possessed with the intent to distribute heroin, a schedule I controlled substance, 28 grams or more of cocaine base, a schedule II controlled substance, and cocaine, a schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1), 841(b)(1)(B); 18 U.S.C. § 2)

A TRUE BILL

[REDACTED]
FOREPERSON

Christina E. Nolan

(by JJB)

CHRISTINA E. NOLAN
United States Attorney
Burlington, Vermont
March 21, 2019